

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS**

**DAVID A. STEBBINS**

**PLAINTIFF**

**v.**

**NO. 3:17-CV-03092-TLB**

**STATE OF ARKANSAS, ARKANSAS  
REHABILITATION SERVICES, AND  
AMY JONES**

**DEFENDANT**

**RESPONSE IN OPPOSITION TO PLAINTIFF'S  
DAUBERT MOTION TO DISQUALIFY LESLIE JOHNSON**

Come now the Defendants, the State of Arkansas, Arkansas Rehabilitation Services ("ARS"), and Amy Jones, by and through their attorneys, Attorney General Leslie Rutledge and Senior Assistant Attorney General Christine A. Cryer, and for their Response in Opposition to Plaintiff's Daubert Motion re: Leslie Johnson, state as follows:

1. Defendants have not identified Leslie Johnson as an expert.
2. Ms. Johnson has been identified as a fact witness. Ms. Johnson will be called to testify regarding her review of records pertaining to Stebbins' ARS file, and based upon her experience, training, etc., what determinations and recommendations she made.
3. She is not going to be called to offer medical testimony regarding any of Stebbins' medical diagnoses. Ms. Johnson is not a medical physician.

WHEREFORE, Defendants respectfully request this Court deny Plaintiff's motion, and for any and all other just and proper relief to which they may be granted.

Respectfully submitted,

Leslie Rutledge  
Attorney General

By: /s/ Christine A. Cryer  
Christine A. Cryer  
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### **CERTIFICATE OF SERVICE**

I, Christine A. Cryer, Senior Assistant Attorney General, do hereby certify that on January 16, 2018, I emailed a copy of the motion to Plaintiff David Stebbins as the following email address:

[stebbinsd@yahoo.com](mailto:stebbinsd@yahoo.com)

A copy is being emailed to Mr. Stebbins because the Office of the Arkansas Attorney General is closed today and the mail will not be picked up today.

I, Christine A. Cryer, Senior Assistant Attorney General, do hereby certify that a copy of this pleading will be mailed, via regular U.S. mail, to Mr. Stebbins at the below address on January 17, 2018.

Mr. David Stebbins  
123 W. Ridge St., Apt. D  
Harrison, Arkansas 72601

/s/ Christine A. Cryer